FACT SHEET

as required by LAC 33:IX.3111 for major LPDES facilities, for draft Louisiana Pollutant Discharge Elimination System Permit No. LA0033430; AI 19356; PER20070001 to discharge to waters of the State of Louisiana as per LAC 33:IX.2311.

The permitting authority for the Louisiana Pollutant Discharge Elimination System (LPDES) is:

Louisiana Department of Environmental Quality

Office of Environmental Services

P. O. Box 4313

Baton Rouge, Louisiana 70821-4313

I. THE APPLICANT IS: City of Oakdale

City of Oakdale Wastewater Treatment Plant

P.O. Box 728

Oakdale, Louisiana 71463

II. PREPARED BY:

Darlene Bernard

DATE PREPARED:

July 28, 2009

III. PERMIT ACTION:

reissue LPDES permit LA0033430, AI 19356; PER20070001

LPDES application received: August 1, 2007

EPA has retained enforcement authority.

Previous LPDES permit effective: February 1, 2003 Previous LPDES permit expired: January 31, 2008

IV. FACILITY INFORMATION:

- A. The application is for the discharge of treated sanitary wastewater from a publicly owned treatment works serving the City of Oakdale.
- B. The permit application does indicate the receipt of industrial wastewater. The industrial dischargers include:

Name of Discharger Flow

Martco Oakdale Oriented Strand Board Facility
Oakdale Federal Correctional Complex

180,000 GPD
390,000 GPD

- C. The facility is located on LA Hwy. 10, approximately 1 mile east of Hospital Drive in Oakdale, Allen Parish.
- D. The treatment facility consists of wet weather lagoon, 2 aerated lagoons, clarification, filtration and post aeration. Disinfection is by chlorination prior to discharge.

E. Outfall 001

Discharge Location:

Latitude 30° 48′ 17" North

Longitude 92° 37′ 34″ West

Description:

treated sanitary wastewater

Design Capacity:

1.46 MGD

Note: Facility proposes to upgrade facility to 2.5 MGD design capacity.

Type of Flow Measurement which the facility is currently using:

Combination Totalizing Meter, Continuous Recorder

V. RECEIVING WATERS:

The discharge is into an unnamed drainage ditch, thence into Beaver Creek, thence into Boggy Bayou, thence into East Fork Bayou Nezpique in Subsegment 050301 of the Mermentau River Basin. This segment is listed on the 303(d) list of impaired waterbodies.

The critical low flow (7Q10) of Beaver Creek is 0 cfs.

The hardness value is 55.35 mg/l and the fifteenth percentile value for TSS is 22.0 mg/l.

The designated uses and degree of support for Subsegment 050301 of the Mermentau River Basin are as indicated in the table below.

| Overall Degree of Support for Segment | Degree of Su | pport of Each | Use | | | · | |
|---------------------------------------|----------------------------|------------------------------------|--------------------------------------|--|--------------------------|---------------------------|-------------|
| Partial | Primary Contact Recreation | Secondary Contact Recreation | Propagation of Fish & Wildlife | Outstanding Natural Resource Water | Drinking Water Supply | Shell fish Propagation | Agriculture |
| | Not Supporting | Full | Not Supporting | N/A . | N/A | N/A | Full |

¹ The designated uses and degree of support for Subsegment 050301 of the Mermentau River Basin are as indicated in LAC 33:IX.1123.C.3, Table (3) and the 2006 Water Quality Management Plan, Water Quality Inventory Integrated Report, Appendix A, respectively.

VI. <u>ENDANGERED SPECIES:</u>

The receiving waterbody, Subsegment 050301 of the Mermentau River Basin, is not listed in Section II.2 of the Implementation Strategy as requiring consultation with the U.S. Fish and Wildlife Service (FWS). This strategy was submitted with a letter dated November 17, 2008 from Rieck (FWS) to Nolan (LDEQ). Therefore, in accordance with the Memorandum of Understanding between the LDEQ and the FWS, no further informal (Section 7, Endangered Species Act) consultation is required. It

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was determined that the issuance of the LPDES permit is not likely to have an adverse effect on any endangered or candidate species or the critical habitat. The effluent limitations established in the permit ensure protection of aquatic life and maintenance of the receiving water as aquatic habitat.

VII. <u>HISTORIC SITES:</u>

The discharge is from an existing facility location, which does not include an expansion beyond the existing perimeter. Therefore, there should be no potential effect to sites or properties on or eligible for listing on the National Register of Historic Places, and in accordance with the 'Memorandum of Understanding for the Protection of Historic Properties in Louisiana Regarding LPDES Permits' no consultation with the Louisiana State Historic Preservation Officer is required.

VIII. <u>PUBLIC NOTICE:</u>

Upon publication of the public notice, a public comment period shall begin on the date of publication and last for at least 30 days thereafter. During this period, any interested persons may submit written comments on the draft permit modification and may request a public hearing to clarify issues involved in the permit decision at this Office's address on the first page of the statement of basis. A request for a public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing.

Public notice published in:

Local newspaper of general circulation

Office of Environmental Services Public Notice Mailing List

For additional information, contact:

Ms. Darlene Bernard
Permits Division
Department of Environmental Quality
Office of Environmental Services
P. O. Box 4313
Baton Rouge, Louisiana 70821-4313

IX. PROPOSED PERMIT LIMITS:

Subsegment 050301, Bayou Nezpique – From headwaters to Mermentau River; includes intermittent portion of Beaver Creek was listed on the court ordered 303(d) list of impaired waterbodies. The suspected causes of impairment are Organic Enrichment/low DO, Pathogen indicators, Suspended Solids, Turbidity, Siltation, Nutrients, and Phosphorus. EPA approved four TMDLs for Bayou Nezpique. They are as follows: DO TMDL on February 25, 2000; Fecal coliform on April 5, 2001; Nutrients TMDL on May 2, 2002, and Sediment Loading TMDL on May 2, 2002. A reopener clause will be established in the permit to allow for the requirement of more stringent effluent limitations and requirements as imposed by any future TMDLs.

Suspended solids/Turbidity/Siltation

As per the TMDL, "Point sources do not represent a significant source of TSS as defined in this TMDL. Because the point sources are minor contributors and discharges of organic suspended solids from point sources are already addressed by LDEQ through their permitting of point sources to maintain water quality standards for DO, the wasteload allocations for point source contributions were set to zero. This TMDL only addresses the landform contribution of TSS/sediment and does not address the insignificant point source contributions." Monitoring for total suspended solids (TSS) in wastewater is an effective indicator of the potential presence of suspected solids in a facility's effluent. To protect against the potential for the introduction of suspended solids into the receiving waterbodies, TSS limits have been established in the permit.

Organic enrichment/low DO

As a result of the approved TMDL, the City of Oakdale is required to have seasonal DO limits of 6 mg/l minimum for summer and 5 mg/l minimum for winter. Therefore, to protect against the potential discharge of DO below that of state water quality standards for the receiving waterbodies, DO limits have been placed in the permit. In addition, CBOD₅ is used as a method to measure the amount of dissolved oxygen in the waste stream utilized by organisms during decomposition of organic matter. Therefore, to protect against the potential for discharges of DO consuming pollutants and for discharges of organic material at levels exceeding state water quality standards, CBOD₅ limits have been placed in the permit.

Nutrients/Phosphorus

As per the TMDL, LDEQ issued a declaratory ruling on April 29, 1996 stating, "that DO directly correlates with overall nutrient impact is a well-established biological and ecological principle. Thus, when the LDEQ maintains and protects DO, the LDEQ is in effect also limiting and controlling nutrient concentrations and impacts." In this TMDL, the nutrient loading required to maintain dissolved oxygen standard will be the nutrient TMDL. A TMDL for phosphorus is not necessary because controls on nitrogen will maintain naturally occurring nitrogen-phosphorus ratios.

To further protect the water body from nutrient impairment, to ensure that monitoring information is available to assess future water quality requirements for this facility and to assist in identifying pollutant sources in this waterbody, monitoring and reporting requirements for phosphorus and nitrates are also established in the permit.

Fecal Coliform

As per the TMDL, "The Louisiana Water Quality Regulations require permitted point source discharges of treated sanitary wastewater to maintain a fecal coliform count of 200cfu/100ml in their effluent, i.e., they must meet the standard at end-of-pipe. Therefore, there will be no change in the permit requirements based upon a wasteload allocation resulting from this TMDL".

Interim Effluent Limits:

OUTFALL 001

An interim period is proposed to allow the facility time for construction of upgrade to plant.

Interim limits shall become effective on the effective date of the permit and last until the completion of the plant upgrade.

| Effluent Characteristic | Monthly Avg. (lbs./day) | Monthly Avg. | Weekly Avg. | Basis |
|----------------------------|-------------------------------|-----------------|----------------|---|
| CBOD₅ | 122 | 10 mg/l | 15 mg/l | Limits are set in accordance with the Statewide Sanitary Effluent Limitations Policy (SSELP) for facilities of this treatment type and size and previous permit conditions. |
| TSS | 183 | 1,5 mg/l | 23 mg/l | Since there are no numeric water quality criterion for TSS, and in accordance with the current Water Quality Management Plan, the TSS effluent limitations shall be based on a case-by-case evaluation of the treatment technology being utilized at a facility. Therefore, a Technology Based Limit has been established through Best Professional Judgement for the type of treatment technology utilized at this facility. |

| Effluent . Characteristic | Monthly Avg. (lbs./day) | Monthly Avg. | Weekly Avg. | Basis |
|--|-------------------------------|--|----------------|---|
| Ammonia-Nitrogen | 49 | 4 mg/l | 8 mg/l | As a requirement of the final TMDL for the Bayou Nezpique Watershed approved by EPA on February 25, 2000, an ammonianitrogen limit of 10 mg/l for both summer and winter months are required for facilities of this type of treatment and size. However, due to toxicity concerns of EPA and LDEQ protocol and the previous permit conditions, the Ammonia-Nitrogen Limits will be set at 4 mg/l monthly average and 8 mg/l weekly average. |
| Dissolved Oxygen March – November December - February | N/A N/A | 6 mg/l _(min) 5 mg/l _(min) | N/A N/A | These limits are set in accordance with the requirements of the final TMDL for the Bayou Nezpique Watershed approved by EPA on February 25, 2000. |

| Effluent Characteristic | Monthly Avg. (lbs./day) | Monthly Avg. | Weekly Avg. | Basis |
|----------------------------|-------------------------------|-----------------|----------------|---|
| Total Phosphorus | N/A | Report mg/l | Report mg/l | BPJ based on receiving stream impairments. The receiving stream is specifically impaired for phosphorus. This is consistent to monitoring requirements for similar facilities discharging to receiving streams impaired for phosphorus. |
| Nitrates | N/A | Report mg/l | Report mg/l | BPJ based on receiving stream impairments. The receiving stream is specifically impaired for nitrates. This is consistent to monitoring requirements for similar facilities discharging to receiving streams impaired for nitrates. |

Priority Pollutants

The previous LPDES permit required water quality based effluent limitations of 0.11 lbs/day monthly average and 0.25 lbs/day daily maximum sampled 1/quarter for Total Copper. DMR data from May 2003 through January 2009 were used to determine the 95th percentile (see attached). Using the 95th percentile a water quality screen was performed (See Appendix B-1 & B-2). The water quality screen does not indicate a need for water quality based Copper effluent limitation. The recalculated limit is less stringent than the prior Copper limitation; however, as per LAC33:IX.2707.L2.a.ii.(a), this is not considered antibacksliding. Therefore, the Copper limitation is removed from the permit.

In addition, the previous LPDES permit required water quality based effluent limitations of 0.92 lbs/day monthly average and 2.17 lbs/day daily maximum sampled 1/quarter for Total Zinc. DMR data from February 2006 through April 2008 and the analysis submitted with the application were reviewed. A geometric average was found and a water quality screen was performed (See Appendix B-1). The water quality screen does not indicate a need for a water quality based Zinc effluent limitation. A review of the discharge monitoring reports for the period beginning February 2006 through April 2008 revealed that

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there were no violations of Zinc. The recalculated limit is less stringent than the prior Zinc limitation; however, as per LAC33:IX.2707.L.2.a.ii.(a), this is not considered antibacksliding. Therefore, the Zinc limitation is removed from the permit.

A water quality screen was performed using the data provided in the permit application. The water quality screen indicated a need for water quality based Chloroform effluent limitations of 1.23 lbs/day monthly average and 2.93 lbs/day daily maximum based upon design capacity of 1.46 MGD. In order to allow facility sufficient time to meet the Chloroform limitation, report is being proposed for this interim period of the permit.

| Effluent Characteristic | Monthly Avg. (lbs./day) | Daily Maximum (lbs/day) | Basis |
|----------------------------|-------------------------------|-------------------------------|--|
| Chloroform | Report | Report | Water Quality Based Limit. See Appendix B-1 for further details. In order to allow the facility sufficient time to meet the chloroform limitation, report is being proposed for this interim period. |

The above draft priority pollutant limits for Chloroform are based upon the evaluation of one effluent analysis. The permittee may conduct and submit the results of three (3) or more additional effluent analyses to either refute or substantiate the presence of the above toxic pollutant during the Draft Permit comment period. The additional analyses will be evaluated by this Office to determine if the pollutant is potentially in the effluent and if it potentially exceeds the State's water quality standards.

Other Effluent Limitations:

1) Fecal Coliform

The discharge from this facility is into a water body which has a designated use of Primary Contact Recreation. According to LAC 33:IX.1113.C.5.a, the fecal coliform standards for this water body are 200/100 ml and 400/100 ml. Therefore, the limits of 200/100 ml (Monthly Average) and 400/100 ml (Weekly Average) are proposed as Fecal Coliform limits in the permit. These limits are being proposed through Best Professional Judgement in order to ensure that the water body standards are not exceeded, and due to the fact that existing facilities have demonstrated an ability to comply with these limitations using present available technology.

2) pH

According to LAC 33:IX.3705.A.1., POTW's must treat to at least secondary levels. Therefore, in accordance with LAC 33:IX.5905.C, the pH shall not be less than 6.0 standard units nor greater than 9.0 standard units at any time.

3) Solids and Foam

There shall be no discharge of floating solids or visible foam in other than trace amounts in accordance with LAC 33:IX.1113.B.7.

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4) Total Residual Chlorine

The previous permit had report for Total Residual Chlorine (TRC). The water quality screen indicated that there was no need for a TRC limit, therefore, report will remain in the permit.

Final Effluent Limits:

The facility proposes to increase the design capacity from 1.46 MGD to 2.5 MGD. Since the final dissolved oxygen TMDL for Bayou Nezpique was based upon a model flow of 1.83 MGD for the City of Oakdale, and no margin of safety beyond the model flow, for purposes of issuing this permit, the maximum flow of 1.83 MGD will be used to calculate loading for CBOD₅ and Ammonia-Nitrogen.

OUTFALL 001

Final limits shall begin after completion of plant upgrade and last through the expiration date of the permit.

| Effluent Characteristic | Monthly Avg. (lbs./day) | Monthly Avg. | Weekly Avg. | Basis |
|----------------------------|-------------------------------|-----------------|----------------|---|
| CBOD₅ | 153 | 10 mg/l | 15 mg/l · | Limits are set in accordance with the Statewide Sanitary Effluent Limitations Policy (SSELP) for facilities of this treatment type and size and TMDL. |
| TSS | 313 | 15 mg/l | 23 mg/l | Since there are no numeric water quality criterion for TSS, and in accordance with the current Water Quality Management Plan, the TSS effluent limitations shall be based on a case-by-case evaluation of the treatment technology being utilized at a facility. Therefore, a Technology Based Limit has been established through Best Professional Judgement for the type of treatment technology utilized at this facility. |

| Effluent Characteristic | Monthly Avg. (lbs./day) | Monthly Avg. | Weekly Avg. | Basis |
|--|-------------------------------|-------------------|----------------|---|
| Nitrogen Amonia- | 61 | 4 mg/l | 8 mg/l | As a requirement of the final TMDL for the Bayou Nezpique Watershed approved by EPA on February 25, 2000, with ammonianitrogen limits set at 10 mg/l for both summer and winder months, for facilities of this type of treatment and size. Due to toxicity concerns of EPA and LDEQ protocol, the AmmoniaNitrogen Limits will be set at 4 mg/l monthly average and 8 mg/l weekly average. |
| Dissolved Oxygen March – November December - February | N/A N/A | 6 min., 5 min. | N/A N/A | These limits are set in accordance with the requirements of the final TMDL for the Bayou Nezpique Watershed approved by EPA on February 25, 2000, for facilities of this type of treatment and size. |
| Total Phosphorus | N/A | Report mg/l | Report mg/l | BPJ based on receiving stream impairments. The receiving stream is specifically impaired for phosphorus. This is consistent to monitoring requirements for similar facilities discharging to receiving streams impaired for phosphorus. |

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| Effluent Characteristic | Monthly Avg. (lbs./day) | Monthly Avg. | Weekly Avg. | Basis |
|----------------------------|-------------------------|-----------------|----------------|---|
| Nitrates | N/A | Report mg/l | Report mg/l | BPJ based on receiving stream impairments. The receiving stream is specifically impaired for nitrates. This is consistent to monitoring requirements for similar facilities discharging to receiving streams impaired for nitrates. |

A water quality screen was performed using the data provided in the permit application. The water quality screen indicated a need for water quality based Chloroform effluent limitations of 1.84 lbs/day monthly average and 4.37 lbs/day daily maximum based upon design capacity of 2.5 MGD. Therefore, limitations for Chloroform will be included in this permit.

| Effluent | Monthly | Daily | Basis |
|------------------|--------------------|-------------------|--|
| Characteristic · | Avg. (lbs./day) | Maximum (lbs/day) | |
| Chloroform | 1.84 | 4.37 | Water Quality Based Limit. See Appendix B-1 for further details. |

Other Effluent Limitations:

1) Fecal Coliform

The discharge from this facility is into a water body which has a designated use of Primary Contact Recreation. According to LAC 33:IX.1113.C.5.a, the fecal coliform standards for this water body are 200/100 ml and 400/100 ml. Therefore, the limits of 200/100 ml (Monthly Average) and 400/100 ml (Weekly Average) are proposed as Fecal Coliform limits in the permit. These limits are being proposed through Best Professional Judgement in order to ensure that the water body standards are not exceeded, and due to the fact that existing facilities have demonstrated an ability to comply with these limitations using present available technology.

2) pH

According to LAC 33:IX.3705.A.1., POTW's must treat to at least secondary levels. Therefore, in accordance with LAC 33:IX.5905.C, the pH shall not be less than 6.0 standard units nor greater than 9.0 standard units at any time.

3) Solids and Foam

There shall be no discharge of floating solids or visible foam in other than trace amounts in accordance with LAC 33:IX.1113.B.7.

5) Total Residual Chlorine

The previous permit had report for Total Residual Chlorine (TRC). The water quality screen indicated that there was no need for a TRC limit, therefore, report will remain in the permit.

Toxicity Characteristics

In accordance with EPA's Region 6 Post-Third Round Toxics Strategy, permits issued to treatment works treating domestic wastewater with a flow (design or expected) greater than or equal to 1 MGD shall require biomonitoring at some frequency for the life of the permit or where available data show reasonable potential to cause lethality, the permit shall require a whole effluent toxicity (WET) limit (Permitting Guidance Document for Implementing Louisiana Surface Water Quality Standards, April 16, 2008 VERSION 6). Whole effluent toxicity testing is the most direct measure of potential toxicity which incorporates the effects of synergism of the effluent components and receiving stream water quality characteristics.

Based on information contained in the permit application and a review of biomonitoring test results required by the previous permit, LDEQ has determined there may be pollutants present in the effluent which may have the potential to cause toxic conditions in the receiving stream in violation of Section 101(a)(3) of the Clean Water Act. Testing since the issuance of the previous permit has demonstrated 1 lethal and 7 sub-lethal test failures for Ceriodaphnia dubia and 1 lethal and 5 sub-lethal test failures for Pimephales promelas. A WET limit is established in the proposed permit to meet narrative criteria which, in part, states that "No substances shall be present in the waters of the State or the sediments underlying said waters in quantities alone or in combination will be toxic to human, plant, or animal life ..." (LAC 33:IX.1113.B.5)

The biomonitoring procedures stipulated as a condition of this permit are as follows:

The permittee shall submit the results of any biomonitoring testings performed in accordance with the LPDES Permit No. LA0033430, Biomonitoring Section for the organisms indicated below.

TOXICITY TESTS FREQUENCY

Chronic static renewal 7-day survival & reproduction test Using Ceriodaphnia dubia (Method 1002.0)

1/quarter

Chronic static renewal 7-day survival & growth test using fathead minnow (Pimephales promelas) (Method 1000.0)

1/quarter

<u>Dilution Series</u> - The permit requires five (5) dilutions in addition to the control (0% effluent) to be used in the toxicity tests. These additional concentrations shall be 31%, 41%, 55%, 73%, and 97%. The biomonitoring critical dilution is defined as 97% effluent. The critical dilution is calculated in Appendix B-2 of this fact sheet. According to the Implementation of State Standards, acute toxicity testing in addition to, or in lieu of, chronic toxicity testing may be imposed for discharges that have a critical dilution of five percent (5%) or less. Results of all dilutions shall be documented in a full report according to the test method publication mentioned in the **Biomonitoring Section** under Whole Effluent Toxicity. This full report shall be submitted to the Office of Environmental Compliance as contained in the Reporting Paragraph located in the **Biomonitoring Section** of the permit.

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X. PREVIOUS PERMITS:

LPDES Permit No. LA0033430: Effective: February 1, 2003

Expired: January 31, 2008

| Effluent | Dischar | ge Limita | tions | | Monitoring Requ | uirements |
|---------------------|----------|-----------|-------------------------------|---------------|--------------------|-----------------|
| Characteristic | Monthly | | Monthly | <u>Weekly</u> | <u>Measurement</u> | Sample |
| | Avg. | | Avg. | Avg. | Frequency | <u>Type</u> |
| Flow | | | Report | Report | Continuous | Recorder |
| CBOD ₅ | 122 lbs/ | day | 10 mg/l | 15 mg/l | 2/week | 6Hr Composite |
| TSS | 183 lbs/ | day | 15 mg/l | · 23 mg/l | 2/week | 6 Hr Composite |
| Ammonia-Nitrogen | 49 lbs/ | day | 4 mg/l | 8 mg/l | 2/week | 6Hr.Composite |
| Dissolved Oxygen | | | | - | | |
| March - November | | | $6 \text{ mg/l}_{\text{(m)}}$ | ninimum) | 2/week | Grab |
| December - February | | | | ninimum) *** | 2/week | Grab |
| Total Residual | | | | | | |
| Chlorine (TRC) | | | Report | Report | 2/week | Grab |
| Fecal Coliform | | | | | | |
| Colonies/100 ml | | • | 200 | 400 | 2/week | Grab |
| pН | Range | (6.0 su - | - 9.0 su) | | 2/week | Grab |
| | | | | | | |
| • | | | | • | Measurement | Sample |
| | | Monthly | y Avg. | Daily Max. | Frequency | Type |
| Copper, Total | | 0.11 lbs | /day | 0.25 lbs/day | 1/quarter | 24 Hr Composite |
| Zinc, Total | | 0.92 lbs | /day | 2.17 lbs/day | 1/quarter | 24 Hr Composite |
| Biomonitoring | | | • | - | - | • |
| Pimephales promelas | | Report | Report | | 1/quarter | 24 Hr Comp |
| Ceriodaphnia dubia | | Report | Report | | 1/quarter | 24 Hr Comp |
| - | | | | | | |

The permit contains biomonitoring.

The permit contains pollution prevention language.

The permit contains pretreatment option 1 language.

XI. ENFORCEMENT AND SURVEILLANCE ACTIONS:

A) Inspections

A review of the files indicates the following most recent inspections performed for this facility.

Date - February 3, 2006

Inspector - LDEQ

Findings and/or Violations -

Hurricane Impact Damage Audit was performed. The treatment plant was not flooded after Hurricane. Clarifer Pump and Activated Sludge Pump was replaced.

Date - August 23, 2006

Inspector - LDEQ

Findings and/or Violations - .

Inspection performed in reference to complaint concerning sewage back up in a residence dwelling. The City installed a new clean out and repaired 6 foot of Line and Hooked properly to the Tap.

> Date - December 7, 2006 Inspector - LDEQ Findings and/or Violations -

> > Compliance Evaluation Inspection was conducted. All of the aerators in both the primary and secondary aeration ponds were operating, the clarifiers were maintained, and the sand filter unit was operating. The flow at outfall 001 was light green. The facility uses an automatic compositor to collect wastewater samples at outfall 001. The thermometer reading inside the compositor was satisfactory. The last calibration for the thermometer was on December 2005. The facility's primary flow device is an Eastech Badger flow recorder. The flow recorder was last calibrated on September 28, 2006. The sludge from the acration ponds are sent to the facility's old oxidation pond. The facility was inaccurately reporting results for TRC. The facility was reporting a daily max. and the permit indicates to report monthly average and weekly average.

Date – September 5, 2008 Inspector – LDEQ Findings and/or Violations –

Hurricane related facility assessment was performed. Facility lost grid power on Monday (9-1-08). Grid power was restored on Wednesday (9-3-08). The WWTP had no generator power during the grid outage. Some flow was diverted to the old oxidation pond and flow through outfall 001 was disinfected with Chlorine (gas) during the outage. The various lift stations were run on generator power during the outage as needed. No physical damage was observed and all units were operating. The effluent was green/brown and a slight odor was observed.

B) Compliance and/or Administrative Orders

A review of the files indicates that no recent enforcement actions have been administered against this facility.

C) DMR Review

A review of EDMS revealed the following Discharge Monitoring Reports from January, 2006 to October, 2008:

| Date | Parameter | Monthly Average (mg/l) | Weekly Average (mg/l) | Monthly Average (lbs/day) |
|-------|---------------------|------------------------|-----------------------|---------------------------|
| 05-06 | TSS | | 24 mg/l | |
| 01-07 | TSS | 17 mg/l | 39 mg/l | 413 lbs/day |
| 02-07 | Ammonia Nitrogen | 6 mg/l | | 82 lbs/day |
| 08-07 | TSS | 24 mg/l | 43 mg/l | 280 lbs/day |
| 09-07 | DO | 5 mg/l (minimum) | | |
| | TSS | 45 mg/l | 67 mg/l | 609 lbs/day |
| · | Ammonia Nitrogen | | | 50 lbs/day |
| | CBOD ₅ | 33 mg/l | 63 mg/l | 442 lbs/day |

| Date | Parameter | Monthly Average | Weekly Average | Monthly Average |
|--------|-------------------|------------------|----------------|-----------------|
| | | (mg/l) | (mg/l) | (lbs/day) |
| 10-07 | DO | 5 mg/l (minimum) | | <u></u> |
| | TSS | 51 mg/l | 77 mg/l | 697 lbs/day |
| | CBOD ₅ | 20 mg/l | 25 mg/l | 264 lbs/day |
| 11-07 | DO | 5 mg/l (minimum) | | |
| | TSS | 112 mg/l | 150 mg/l | 1,732 lbs/day |
| | CBOD ₅ | 32 mg/l | 38 mg/l | 487 lbs/day |
| 12-07 | TSS | 41 mg/l | 90 mg/l | 604 lbs/day |
| | CBOD ₅ | 16 mg/l | 34 mg/l | 240 lbs/day |
| 01-08 | TSS | 85 mg/l | 110 mg/l | 1,469 lbs/day |
| | CBOD ₅ | 56 mg/l | 99 mg/l | 998 lbs/day |
| 02-08- | TSS | 28 mg/l | 33 mg/l | 526 lbs/day |
| | CBOD ₅ | 22 mg/l | 37 mg/l | 424 lbs/day |
| 03-08 | TSS | | 33 mg/l | 256 lbs/day |
| | Ammonia | | 10 mg/l | |
| | Nitrogen | | | |
| | CBOD ₅ | | | 167 lbs/day |
| 04-08 | TSS | 78 mg/l | 128 mg/l | 1,001 lbs/day |
| - | Ammonia | | 11 mg/l | |
| | Nitrogen | | | |
| | CBOD ₅ | 30 mg/l | 53 mg/l | 335 lbs/day |
| 05-08 | DO | 5 mg/l (minimum) | | |
| | TSS | 21 mg/l | 62 mg/l | 262 lbs/day |
| _ | CBOD ₅ | 23 mg/l | 76 mg/l | 311 lbs/day |
| 06-08 | DO | 5 mg/l (minimum) | | |
| | TSS | 26 mg/l | 36 mg/l | 324 lbs/day |
| | CBOD ₅ | 15 mg/l | 23 mg/l | 188 lbs/day |
| 07-08 | DO | 5 mg/l (minimum) | | <u> </u> |
| | TSS | 23 mg/l | 34 mg/l | 267 lbs/day |
| | CBOD ₅ | 12 mg/l | 24 mg/l | 139 lbs/day |
| .08-08 | CBOD ₅ | 11 mg/l | | |
| 09-08 | TSS | 19 mg/l | 38 mg/l | 275 lbs/day |
| | CBOD ₅ | 16 mg/l | 26 mg/l | 233 lbs/day |
| 10-08 | TSS | 23 mg/l | 34 mg/l | 294 lbs/day |
| | CBOD ₅ | 15 mg/l | 19 mg/l | 183 lbs/day |

XII. <u>ADDITIONAL INFORMATION:</u>

LDEQ reserves the right to impose more stringent discharge limitations and/or additional restrictions in the future. Additional limitations and/or restrictions are based upon water quality studies and can indicate the need for advanced wastewater treatment. Water quality studies of similar dischargers and receiving water bodies have resulted in monthly average effluent limitations of 5mg/L CBOD₅ and 2 mg/L NH₃-N. Prior to upgrading or expanding this facility, the permittee should contact LDEQ to determine the status of the work being done to establish future effluent limitations and additional permit conditions.

Final offluent loadings (i.e. lbs/day) have been established based upon the permit limit concentrations and the design capacity of 1.83 MGD.

Effluent loadings are calculated using the following example:

 BOD_5 : 8.34 gal/lb x 1.83 MGD x 30 mg/l = 153 lbs/day.

The Monitoring Requirements, Sample Types, and Frequency of Sampling for the facility are described below:

| Effluent Characteristics | | Monitoring Requirements | |
|--------------------------|---------------------|-------------------------|------------------|
| | | Measurement | Sample . |
| | | Frequency | <u>Type</u> |
| Flow | | Continuous | Recordér |
| CBOD ₅ | | 2/week | 6 Hr. Composite |
| Total Suspended Solids | | 2/week | 6 Hr. Composite |
| Ammonia Nitrogen | | 2/week | 6 Hr. Composite |
| Total Phosphorus | | 1/quarter | Grab |
| Nitrates | | 1/quarter | Grab |
| Chloroform | | 1/quarter | 24 Hr. Composite |
| Dissolved Oxygen | | 2/week | Grab |
| TRC | | 2/week | Grab |
| Fecal Coliform Bacteria | | 2/week | Grab |
| pН | | 2/week | Grab |
| TRC | | l/day | Grab |
| Biomonitoring | Ceriodaphnia dubia | 1/quarter | 24 Hr. Composite |
| - - | Pimephales promelas | 1/quarter | 24 Hr. Composite |

Pretreatment Requirements

Based upon consultation with LDEQ pretreatment personnel, LDEQ Option1 Pretreatment Language is required for this facility.

Pollution Prevention Requirements

The permittee shall institute or continue programs directed towards pollution prevention. The permittee shall institute or continue programs to improve the operating efficiency and extend the useful life of the facility. The permittee will complete an annual Environmental Audit Report <u>each vear</u> for the life of this permit according to the schedule below. The permittee will accomplish this requirement by completing an Environmental Audit Form which has been attached to the permit. All other requirements of the Municipal Wastewater Pollution Prevention Program are contained in Part II of the permit.

The audit evaluation period is as follows:

| Andregeriou | Audit Period Ends | Audit Report Completion Date |
|--------------------------|---|---|
| Effective Date of Permit | 12 Months from Audit Period Beginning Date | 3 Months from Audit Period Ending Date |

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Stormwater Discharges

Because the design flow of the City of Oakdale Wastewater Treatment Plant is equal to or greater than 1.0 MGD and in accordance with LAC 33:IX.2511.B.14.i, the facility may contain storm water discharges associated with industrial activity. Therefore, in accordance with LAC 33:IX.2511.A.1.b, specific requirements addressing stormwater discharges will be included in the discharge permit.

XIII TENTATIVE DETERMINATION:

On the basis of preliminary staff review, the Department of Environmental Quality has made a tentative determination to reissue a permit for the discharge described in this Statement of Basis.

XIV <u>REFERENCES</u>:

Louisiana Water Quality Management Plan / Continuing Planning Process, Vol. 8, "Wasteload Allocations / Total Maximum Daily Loads and Effluent Limitations Policy," Louisiana Department of Environmental Quality, 2005.

Louisiana Water Quality Management Plan / Continuing Planning Process, Vol. 5, "Water Quality Inventory Section 305(b) Report," Louisiana Department of Environmental Quality, 1998.

Louisiana Administrative Code, Title 33 - Environmental Quality, Part IX - Water Quality Regulations, Chapter 11 - "Louisiana Surface Water Quality Standards", Louisiana Department of Environmental Quality, 2004.

<u>Louisiana Administrative Code, Title 33 - Environmental Quality, Part IX - Water Quality Regulations, Subpart 2 - "The LPDES Program"</u>, Louisiana Department of Environmental Quality, 2004.

<u>Low-Flow Characteristics of Louisiana Streams</u>, Water Resources Technical Report No. 22, United States Department of the Interior, Geological Survey, 1980.

<u>Index to Surface Water Data in Louisiana</u>, Water Resources Basic Records Report No. 17, United States Department of the Interior, Geological Survey, 1989.

<u>LPDES Permit Application to Discharge Wastewater</u>, City of Oakdale, Oakdale Wastewater Treatment Plant, August 1, 2007.